

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	No. 4:23-CR-243
v.	§	JUDGE ALM/AGD
	§	
LASHONDA MOORE (01)	§	
MARLON MOORE (02)	§	

**MOTION FOR ENTRY OF PROTECTIVE ORDER REGARDING DISCOVERY
PURSUANT TO FED. R. CRIM. P. 16(d)(1)**

Pursuant to Federal Rule of Criminal Procedure 16(d) and 18 U.S.C. § 3771(a), the United States of America, by and through the undersigned, moves for the entry of a protective order regarding the dissemination of discovery and offense materials, and in support thereof states as follows:

1. The defendants, **LaShonda Moore** and **Marlon Moore**, were charged on November 8, 2023, in a nine-count indictment with violations of 18 U.S.C. § 1349 (Conspiracy to Commit Wire Fraud); 18 U.S.C. § 1343 (Wire Fraud), and 18 U.S.C. § 1957 (Money Laundering).

2. Pursuant to Federal Rule of Criminal Procedure 16, the Government intends to produce discovery material to defendants' counsel.

3. This discovery will include sensitive information, whose unrestricted dissemination could adversely affect law enforcement interests and the privacy interests of third parties.

4. To protect the aforementioned interests, the Government requests that the Court enter an order of protection regarding the dissemination of the discovery.

5. The Court's authority to issue such an order is well established. Specifically, Rule 16(d)(1) permits courts to enter protective orders that deny, restrict, or defer discovery or inspection, or grant other appropriate relief for good cause. Rule 49.1(e) provides authority to issue protective orders concerning matters of privacy and personal information. *Id.* Indeed, "[a] trial court can and should, where appropriate, place a defendant and his counsel under enforceable orders against unwarranted disclosure of the materials which they may be entitled to inspect." *Alderman v. United States*, 394 U.S. 165, 185 (1969).

6. Accordingly, the Government requests this Court limit the disclosure of these documents, as specified in the proposed protective order.

WHEREFORE the United States respectfully requests that the Court enter a protective order regarding the discovery materials in this case.

Respectfully submitted,

GLENN S. LEON
FRAUD SECTION CHIEF

/s/ Theodore M. Kneller
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Motion for Entry of Protective Order Pursuant to Fed. R. Crim. P. 16(d)(1) has been served on counsel of record for defendants via the court's CM/ECF system on the 6th day of December 2023.

/s/ Theodore M. Kneller
THEODORE M. KNELLER
Trial Attorney, Fraud Section

CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with counsel for the defendants regarding the merits of this motion, and they are unopposed to the granting of the motion.

/s/ Theodore M. Kneller
THEODORE M. KNELLER
Trial Attorney, Fraud Section